

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

H.B.,	)	
	)	
Plaintiff,	)	CIVIL ACTION FILE
v.	)	NO. 1:22-CV-01181-JPB
	)	
RED ROOF INNS, INC.; and	)	
FMW RRI I, LLC.	)	
	)	
Defendants.	)	

**DEFENDANT RED ROOF INNS, INC.’S OBJECTIONS AND RESPONSES  
TO PLAINTIFF’S FIRST INTERROGATORIES**

COMES NOW Red Roof Inns, Inc. (hereinafter “RRI” or “Defendant), a Defendant in the above-captioned civil action, and hereby responds to Plaintiffs’ First Interrogatories to Defendant Red Roof Inns, Inc. as follows:

**PRELIMINARY STATEMENT**

1. The following Responses are based upon information presently available to Defendant, which Defendant believes to be correct. These Responses are made without prejudice to its right to utilize subsequently discovered facts.

2. No incidental or implied admissions of fact by Defendant is made by the Responses below. The only admissions are express admissions. The fact that Defendant has responded to any Requests herein may not be properly taken as an admission that Defendant accepts or admits the existence of any facts set forth or assumed by such Requests, or that such Responses constitute admissible evidence. The fact that Defendant has responded to part or all of the Requests is not intended to be, and shall not be construed to be, a waiver by Defendant of all or any part of any objections made by Defendant to any Request.

12.

Please identify each and every person who was employed at or worked at the Hotel, including subcontractors and independent contractors, from 2007 through 2012, and for each such person, please state their job title, provide all last known contact information (phone number, email, mailing address, etc.), and state whether each such person is still employed by the Hotel currently.

**RESPONSE: Defendant objects to this Interrogatory as over-burdensome, overbroad and not tailored to the subject of this lawsuit because it is not limited to a specific subject matter and is unrelated to the facts of the case. As such, this Interrogatory is not reasonably calculated to lead to the discovery of admissible evidence.**

**Subject to and without waiving this objection, while RRI did employ the local staff at the RRI Norcross, it is not in possession or control of any employee records and cannot identify the employees that were involved at the Norcross RRI because it is beyond the relevant document retention policy, which has been produced to Plaintiff.**

13.

Please identify and describe in detail any program, policy, industry standard, procedure, or action followed by you on or before January 31, 2012, which relate to safety, warnings, or trainings to help reduce or minimize the risk of any violent crime, sexual assaults, rapes, commercial sex activity, prostitution, pimping, indecent exposure, sex trafficking, or other sex crimes occurring at Defendant's Hotel.

**RESPONSE: Defendant objects to this Interrogatory as over-burdensome and vague to the extent it does not specify or define program, policy, industry standard, procedure, or action implemented. Defendant further objects to this Interrogatory as overbroad and not tailored to the subject of this lawsuit because it is not limited to a**

Respectfully submitted this 19th day of August, 2022.

LEWIS BRISBOIS BISGAARD  
& SMITH LLP

600 Peachtree Street NE  
Suite 4700

Atlanta, Georgia 30308

(404) 348-8585

(404) 467-8845 Facsimile

[Chuck.Reed@lewisbrisbois.com](mailto:Chuck.Reed@lewisbrisbois.com)

[Adi.Allushi@lewisbrisbois.com](mailto:Adi.Allushi@lewisbrisbois.com)

[Tameika.Briscoe@lewisbrisbois.com](mailto:Tameika.Briscoe@lewisbrisbois.com)

/s/ Tameika L. Briscoe

CHARLES K. REED

Georgia Bar No. 597597

ADI ALLUSHI

Georgia Bar No. 852810

TAMEIKA L. BRISCOE

Georgia Bar No. 517405

*Attorneys for Defendants Red Roof Inns, Inc.*